



# CVCWA Central Valley Clean Water Association

*Representing Over Fifty Wastewater Agencies*

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February 21, 2017

***Via Electronic Mail Only***

Mr. Glenn Meeks  
California Regional Water Quality Control Board  
Central Valley Region  
11020 Sun Center Drive, #200  
Rancho Cordova, CA 95670  
[Glenn.Meeks@waterboards.ca.gov](mailto:Glenn.Meeks@waterboards.ca.gov)

RE: Comment Letter – Salt and Nitrate Management Plan (SNMP) for the Central Valley

Dear Mr. Meeks:

The Central Valley Clean Water Association (CVCWA) appreciates the opportunity to provide these comments in response to the Salt and Nitrate Management Plan for the Central Valley (SNMP). CVCWA represents over 50 publicly-owned treatment works (POTWs) that provide wastewater collection, treatment, and disposal for over seven million people in the Central Valley. CVCWA's mission is to represent the interests of wastewater agencies in the Central Valley in regulatory matters that balance the need for environmental protection based on sound scientific information with a fair and reasonable economic basis. CVCWA is an active participant in the Central Valley Salinity Alternatives for Long-Term Sustainability (CV-SALTS), and has reviewed and commented on draft versions of the Salt and Nitrate Management Plan (SNMP) and its various components as they have been developed. As an active participant in CV-SALTS, CVCWA has a significant interest in the Central Valley Regional Water Quality Control Board's (Central Valley Water Board) actions to accept the SNMP, and to take steps to initiate basin planning actions to develop and incorporate amendments into the Water Quality Control Plans for the Central Valley, would implement the SNMP.

In summary, CVCWA supports adoption of *Draft Resolution R5-2017-XXXX Accepting the Salt and Nitrate Management Plan for the Central Valley Region Developed Under the CV-SALTS Initiative and Directing Staff to Initiate Basin Plan Amendments as Appropriate to Implement the Plan* (Draft Resolution). Overall, the SNMP represents a fair balance for managing nitrates and salts within the Central Valley as it reflects the interests of many diverse stakeholders, and its proposed policies reflect significant compromises made by many stakeholders. However, as has been stated many times throughout the development of the SNMP, CVCWA believes strongly that implementation of the SNMP, and in particular the Salinity Management Strategy, must be borne by many in California, including those that rely on water resources that emanate from the Central Valley. Salt problems within the Central Valley are complex, and are not caused solely (or even significantly) by discharges of salinity from those that reside in the Central Valley.

With respect to the individual proposed strategies and policies (See Finding 22 of the Draft Resolution), CVCWA supports the flexible, additional authorities that adoption of these policies would provide to the Central Valley Water Board. Notably, adoption of the strategies and policies into the Water Quality Control Plans does not automatically authorize discharges in such a manner as would be allowed by the strategies and/or policies. But, adoption of these strategies/policies would provide the Central Valley Water Board with authority to consider such options on a case-by-case basis.

Also, as the Central Valley Water Board directs its staff to initiate amendments to the Water Quality Control Plans, CVCWA encourages the Central Valley Water Board to understand (and direct its staff accordingly) to include the three management goals and associated strategies and policies as a collective foundation for such amendments. Selecting only some, or portions, of the SNMP goals, strategies, and policies will inevitably upset the balance that was otherwise reached through development of the SNMP and its component parts.

Finally, CVCWA reserves its right to comment throughout the public process that is employed for development of amendments to the Water Quality Control Plans. We will continue to be an active participant, and look forward to working with your staff and other stakeholders as we move towards implementing the next steps in this process.

We appreciate your consideration of these comments. If you have any questions or if CVCWA can be of further assistance, please contact me at (530) 268-1338 or [ecofficer@cvcwa.org](mailto:ecofficer@cvcwa.org).

Sincerely,



Debbie Webster,  
Executive Officer